

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

QUALCOMM INC., a Delaware corporation,
and QUALCOMM TECHNOLOGIES, INC.,
a Delaware corporation,

Plaintiffs,

v.

ARM HOLDINGS PLC, f/k/a ARM LTD., a
U.K. corporation,

Defendant.

REDACTED - PUBLIC VERSION
(Filed November 21, 2025)

C.A. No. 24-490-MN

[REDACTED]

[REDACTED]

**ARM HOLDINGS PLC'S CONCISE STATEMENT OF ADDITIONAL FACTS IN
SUPPORT OF ITS OPPOSITION TO QUALCOMM'S MOTION FOR PARTIAL
SUMMARY JUDGMENT**

Dated: November 7, 2025

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I. FACTS PRECLUDING COLLATERAL ESTOPPEL SUMMARY JUDGMENT

1. In May 2022, an Arm engineer compared the [REDACTED] and [REDACTED] cores and concluded [REDACTED] Ex. 1. Arm’s Chief Architect stated [REDACTED] [REDACTED] *Id.*

2. In September 2022, an Arm engineer compared the [REDACTED] and [REDACTED] cores and remarked [REDACTED] [REDACTED] Ex. 2 at -388-89; Ex. 3 § XIII.

3. On January 8, 2025, Arm told Qualcomm it would “treat the Nuvia CPUs as falling within the scope of the Qualcomm ALA” and to “provide support for the Nuvia CPUs, including support and verification services” TI SOF Ex. 9; Ex. 4 at ROG 1; Ex. 5 at ROG 10.

II. FACTS THAT PRECLUDE SUMMARY JUDGMENT ON ARM’S ALLEGED BREACH OF THE TLA

4. As of April 2024, [REDACTED] [REDACTED] Ex. 6 at 49:13–51:10.

5. In April 2024, [REDACTED] [REDACTED] Ex. 7 at -056.

6. Qualcomm asked [REDACTED] [REDACTED] Ex. 7; TLA SOF Ex. 4. [REDACTED] TLA SOF Ex. 5.

7. In September 2024, [REDACTED] [REDACTED] [REDACTED] Exs. 8, 9.

8. Arm responded to Qualcomm’s letters on October 23, 2024. TLA SOF Ex. 8. Arm stated [REDACTED]

[REDACTED]. *Id.* at -914. Arm further stated that [REDACTED]

[REDACTED]

[REDACTED] *Id.* at -915.

9. Arm provided an [REDACTED]

[REDACTED] TLA SOF Ex. 7; [REDACTED] SOF Ex. 27.

10. Arm [REDACTED]

[REDACTED] Ex. 5 at 58-60. [REDACTED]

[REDACTED] Ex. 10 ¶¶ 106-112.

11. In the [REDACTED]

[REDACTED] TLA SOF Ex. 7; [REDACTED] SOF Ex. 27 at -830.

12. Karthik Shivashankar testified that [REDACTED]

[REDACTED]

Ex. 11 at 60:3-63:3, 62:24-65:1.

13. Ehab Youssef confirmed that [REDACTED]

[REDACTED] Ex. 12 at 61:6-62:8. [REDACTED]

[REDACTED]

[REDACTED] Ex. 11 at 85:11-86:10; *see also id.* at 89:12-24, 89:25-

90:6, 95:6-96:25. [REDACTED]

[REDACTED] Ex. 11 at 85:20-86:15, 89:24-90:16; Ex. 12 at 71:4-72:9 [REDACTED]

[REDACTED]

14. Akshay Bhatnagar was [REDACTED]

[REDACTED] Ex. 13 at 35:3-36:8, 40:24-42:1, 74:21-

76:5. [REDACTED]. *Id.* at 47:2-23, 71:9-24.

15. [REDACTED]

[REDACTED] Ex. 12 at 63:25-

64:22, 65:24-68:24 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Ex. 10 ¶¶ 106-112; Ex. 14 at -847, -851.

16. After Arm determined the [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Ex. 12 at 68:25-71:3. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.* at 70:12-71:21. [REDACTED]

[REDACTED] *Id.*

17. [REDACTED]

[REDACTED]

[REDACTED] TLA SOF Ex. 14 at 48:18-21, 49:13-50:2,

168:2-17; TLA SOF Ex. 13; [REDACTED] SOF Ex. 28 (SMA).

18. [REDACTED]

[REDACTED] TLA SOF Ex. 7; [REDACTED] SOF Ex. 27 at -830 [REDACTED]

[REDACTED]

19. Qualcomm [REDACTED]

[REDACTED] Ex. 15 at 130:21-133:3, 179:14-19.

III. FACTS THAT PRECLUDE SUMMARY JUDGMENT ON UNCLEAN HANDS

20. Qualcomm has participated in private meetings with the European Commission, US Federal Trade Commission, and Korea Fair Trade Commission and provided with confidential filings alleging Arm has engaged in anticompetitive behavior. Ex. 16 at 1; Ex. 17 at 192:25-193:3.

21. On March 25, 2025, Bloomberg published an article titled “Qualcomm Takes Legal Fight with Arm to Global Antitrust Agencies,” about Qualcomm’s non-public complaints of anticompetitive behavior at the European Commission, US Federal Trade Commission, and Korea Fair Trade Commission. Ex. 16. Before the story was published in Bloomberg, Qualcomm had been in contact with Josh Sisco, an author of the article, about the story. Opp. Ex. 17 at 22:5-23:25, 191:23-192:11.

22. Qualcomm’s General Counsel [REDACTED]

[REDACTED]. *Id.* at 201:10-204:3, 185:23-186:1.

23. Arm raised four bases for unclean hands, Qualcomm: (i) induced Nuvia to materially breach the Nuvia ALA; (ii) published the contents of the Breach Letter just days after Arm did; (iii) leaked to Bloomberg non-public complaints for the March 25, 2025 article; and (iv) [REDACTED] were made in bad faith, were deceitful, and/or were fraudulent. D.I. 234 at 43-44; Ex. 5 at 21-23; Ex. 19 at 2-6.

Dated: November 7, 2025

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 7, 2025, a copy of the foregoing document was served on the counsel listed below in the manner indicated:

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